

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Salvador Quintero,)	Court File No. 1:13-cv-06249
)	
Plaintiff,)	Honorable Robert M. Dow, Jr.
)	
v.)	
)	
Canadian Pacific Railway, ¹)	
)	
Defendant)	

DEFENDANT'S MOTION FOR SUMMARY JUDGMENT

COMES NOW Defendant Soo Line Railroad Company d/b/a Canadian Pacific ("CP"), by and through its undersigned counsel, pursuant to Federal Rule of Civil Procedure 56, and for the reasons set forth fully in the supporting memorandum filed contemporaneously herewith, respectfully moves this Court to grant its Motion for Summary Judgment. Pursuant to Local Rule 56.1(a), this motion is accompanied by: (1) a supporting memorandum of law; (2) a Rule 56.1 a statement of material facts as to which there is no genuine issue and which entitles Defendant to judgment as a matter of law dismissing this case with prejudice in its entirety; and (3) exhibits to the Rule 56.1 statement, including affidavits and depositions as contemplated by Federal Rule of Civil Procedure 56(e).

¹ The proper entity name is Soo Line Railroad Company d/b/a Canadian Pacific.

Dated:

Respectfully submitted,

STINSON LEONARD STREET LLP

/s/ Johnny S. Wang
Johnny S. Wang (Illinois Bar #6292065)
7700 Forsyth Blvd, Suite 1100
St. Louis, Missouri 63105
Telephone: 314.863.0800
johnny.wang@stinsonleonard.com

and

Matthew T. Layman (#6293202)
DALEY MOHAN GROBLE
55 W. Monore, Suite 1600
Chicago, Illinois 60603
Telephone: 312.422.9999

**ATTORNEYS FOR DEFENDANT
SOO LINE RAILROAD COMPANY,
D/B/A CANADIAN PACIFIC**

CERTIFICATE OF SERVICE

I hereby certify that on the 23rd day of March, 2015, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system and a copy was made available to all electronic filing participants.

/s/ Johnny Wang
Johnny Wang